National Aeronautics and
Space Administration

Principal Center for Regulatory Risk Analysis and Communication

REGULATORY ALERT

ECHA Proposed SVHCs

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Date [Reference]: 30 August 2010 [Proposals]

Regulatory Agency: European Chemicals Agency

Rulemaking Type: Proposal

Title: Proposal to Name Eleven Chemicals as Substances of Very High Concern

Summary:

On 30 August 2010, the European Chemicals Agency (ECHA) published proposals to identify 11 chemicals as substances of very high concern (SVHCs). SVHCs are defined in Article 57 of the European Union (EU) Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) Regulation 1907/2006. Substances defined as SVHCs may have potentially serious effects on human health and the environment. Of the 11 proposed substances, 8 are considered carcinogenic, mutagenic, or toxic for reproduction (CMR). The other 3 are considered as being of equal concern as persistent, bioaccumulative and toxic (PBT) substances. The names of the substances, the reasons for their proposal as SVHCs, and their potential uses are provided below:

Substance	Proposed Property	Potential Uses
1,2,3-Trichlorobenzene	PBT-like substance	Intermediate for synthesis and as a process solvent in closed systems.
1,2,4-Trichlorobenzene	PBT-like substance	Intermediate for synthesis and as a process solvent in closed systems.
1,3,5-Trichlorobenzene	PBT-like substance	Intermediate for synthesis and as a process solvent in closed systems.
Cobalt(II) sulphate	CMR	Production of other chemicals, manufacture of catalysts and driers, surface treatments (electroplating) corrosion prevention, production of pigments, decolourizing (in glass or pottery), batteries, and others.
Cobalt(II) dinitrate	CMR	Production of other chemicals, manufacture of catalysts, surface treatment, and batteries.
Cobalt(II) carbonate	CMR	Manufacture of catalysts, feed additive, production of other chemicals, production of pigments, and adhesion (in ground coat frit).
Cobalt(II) diacetate	CMR	Manufacture of catalysts, production of other chemicals, surface treatment, alloys, production of pigments, dyes, rubber adhesion, and feed additive.
2-Methoxyethanol	CMR	Solvent, chemical intermediate and additive for fuels.
2-Ethoxyethanol	CMR	Solvent and chemical intermediate.
Chromium trioxide	CMR	Metal finishing, fixing agent in waterborne wood preservatives.
Acids generated from chromium trioxide and their oligomers: ▪ Chromic acid& its oligomers ▪ Dichromic acid and its oligomers	CMR	Metal finishing, fixing agent in waterborne wood preservatives.

Any proposed substances that the ECHA Member State Committee decides to identify as SVHCs will be included in the Candidate List from which substances are chosen for Authorization. Such substances could be subject to stricter standards and elimination from the European market. Following a transition period, substances on the Authorization List may only be used if a specific authorization is granted. The SVHC proposals for the 11 chemicals listed above are open for public comment until 14 October 2010.

Potential Impacts to NASA:

EU regulations, such as REACH, do not affect NASA operations directly, but can affect the supply chain significantly. REACH imposes requirements that affect products produced in or imported into the EU. The stringency of those requirements can cause manufacturers who market products in the EU to reformulate or terminate production of materials containing regulated substances. As REACH is implemented over time, it is expected to become an increasingly important driver of materials obsolescence risk.

Additional Information:

ECHA website, Candidate List of Substances of Very High Concern for Authorization:
http://echa.europa.eu/chem_data/authorisation_process/candidate_list_en.asp

RRAC PC Regulatory Summary on the original version of the REACH regulation:
http://www.nasa.gov/pdf/355564main_Guidance%20on%20REACH_January%202007.pdf